

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 2:23-cr-242
	:	
vs.	:	Judge Edmund A. Sargus, Jr.
	:	
JOEL MEFFORD,	:	
	:	
Defendant.	:	

DEFENDANT'S MOTION FOR CONTINUANCE

Now comes Defendant, Joel Mefford, by and through his undersigned counsel, and respectfully requests a continuance of the trial currently scheduled for June 17, 2024, for reasons more fully set forth in the attached Memorandum in Support. In the event the Court finds the Defendant's motion well taken, the Defendant waives his right to a speedy trial during the period of the continuance.

Respectfully submitted,

/s/ Gregory S. Peterson

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Counsel for Defendant Joel Mefford

MEMORANDUM IN SUPPORT

The Defendant was charged by the Grand Jury by way of indictment on December 19, 2023, with 3 counts of Possession with Intent to Distribute Cocaine and 1 count of Money Laundering. (Doc. 4). Defendant entered a not guilty plea and the matter was scheduled for jury trial on April, 8, 2024 which was continued until the current trial date of June 17, 2024.

As the Court is aware, the allegations in the indictment are complicated. Defense Counsel has exercised due diligence investigating the allegations, engaging the government in meaningful plea negotiations and trial preparation. The Defendant's request for additional time is not being done to unnecessarily delay or hinder the proceedings, but rather to effectively review discovery and, following production, allow for the preparation of an effective defense.

In addition to the additional time needed to continue and conclude plea negotiations, counsel for the Defendant has been faced with the terminal illness of a close family member. This personal situation has created significant challenges to meeting and conferring with the defense team with their client as the Defendant is being held approximately three hours away from Columbus. Counsel will endeavor to manage this situation and resume meaningful communication and consultation as soon as possible.

In the event the Court finds the Defendant's request well taken, the Defendant specifically and expressly waives his right to a speedy trial during the period of the continuance. The Government does not object to the Defendant's request.

For the foregoing reasons and any others which may appear to the Court, Defendant requests the Court grant the relief sought herein.

Respectfully submitted,

/s/ Gregory S. Peterson

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Counsel for Defendant Joel Mefford

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Court using the CM/ECF system electronically this 22nd day of May, 2024, and served using the CM/ECF system via e-mail upon the following:

Peter Glenn-Applegate, Esq.
Elizabeth Geraghty, Esq.
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/s/ Gregory S. Peterson

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